

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING ADDITIONAL BRIEFING
FOR CERTAIN DEFENDANTS' MOTIONS TO DISMISS THE CONSOLIDATED
SECOND AMENDED COMPLAINT**

WHEREAS, on April 28, 2022, this Court issued an Order Regarding Time to File Consolidated Second Amended Complaint and Motions to Dismiss (ECF No. 111) providing that Defendants shall file their motions to dismiss the Consolidated Second Amended Complaint ("CSAC") by June 3, 2022; Lead Plaintiff shall file oppositions to the motions to dismiss by July 7, 2022; and Defendants shall file replies in further support of the motions to dismiss by August 5, 2022;

WHEREAS, on June 3, 2022, Defendant DiDi Global, Inc. and the Underwriter Defendants filed their Motions to Dismiss the CSAC (ECF Nos. 112-17);

WHEREAS, certain Individual Defendants were thereafter served with the initial complaint filed in this Action, *Espinal v. DiDi Global Inc., et al.*, and thereafter agreed not to oppose such service as ineffective;

WHEREAS, on June 27, 2022, this Court issued an Order Regarding Briefing Schedule for Defendants' Motions to Dismiss the Consolidated Second Amended Complaint (ECF No. 119) (the "June 27 Order") providing that the Individual Defendants shall file their motions to dismiss the Consolidated Second Amended Complaint ("CSAC") by July 22, 2022; Lead Plaintiff shall

file oppositions to the motions to dismiss by August 22, 2022; and Defendants shall file replies in further support of the motions to dismiss by October 3, 2022;

WHEREAS, per the June 27 Order, on July 22, 2022, Defendants Will Wei Cheng, Jean Qing Liu, Stephen Jingshi Zhu, Alan Yue Zhuo, Daniel Yong Zhang, Zhiyi Chen, and Martin Lau filed their Motions to Dismiss (ECF Nos. 128-32);

WHEREAS, per the June 27 Order, on August 22, 2022, Lead Plaintiff filed an Omnibus Memorandum of Law in Opposition to [all] Defendants' Motions to Dismiss the CSAC filed on June 3, 2022 and July 22, 2022 (ECF No. 137);

WHEREAS, thereafter, Defendants Adrian Perica and Kentaro Matsui were served with the complaint filed in this Action;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. Defendants Adrian Perica and Kentaro Matsui shall file a motion to dismiss the CSAC by October 10, 2022;
2. Lead Plaintiff shall file an opposition to the motion to dismiss by October 24, 2022; and
3. Defendants shall file any reply (if necessary) in further support of their motion to dismiss the CSAC by October 31, 2022.

Respectfully submitted,

Dated: October 4, 2022

/s/ Corey Worcester

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*Lead Counsel for Lead Plaintiff
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SO ORDERED.

DATED: _____

Hon. Lewis A. Kaplan, U.S. District Judge

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 4th day of October 2022, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Corey Worcester